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November 17, 2000



Honorable Vernon A. Williams
Office of the Secretary
Case Control Unit
Attn: STB Ex Parte No. 582
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423-0001

ENTERED
Office of the Secretary

NOV 17 2000

Part of
Public Record

Re: *Major Rail Consolidation Procedures*
Ex Parte 582 (Sub-No. 1)

Dear Sir:

I am enclosing an original and twenty-five (25) copies of the Comments of the State of Maryland Department of Transportation in the above-referenced proceeding. An additional copy is enclosed for date-stamp and return to our messenger. Please note that a copy of this filing is also enclosed on a 3.5 inch diskette in WordPerfect format.

Sincerely,

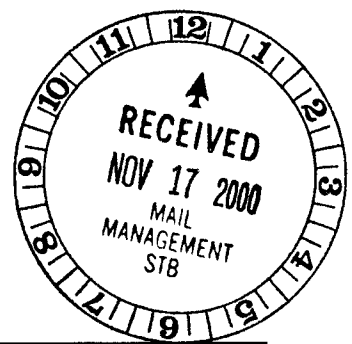
Charles A. Spitulnik

Charles A. Spitulnik

Enclosure

cc: Julia M. Farr, Esquire
Surface Transportation Board

Before the
SURFACE TRANSPORTATION BOARD
Washington, D.C. 20423



Ex Parte 582 (Sub-No.1)

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MAJOR RAIL CONSOLIDATION PROCEDURES

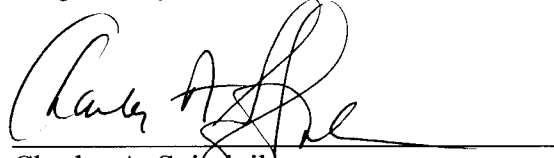
**COMMENTS OF
THE STATE OF MARYLAND
DEPARTMENT OF TRANSPORTATION**

The State of Maryland Department of Transportation, by its undersigned counsel, hereby submits its comments on the proposed rules to govern railroad mergers that are set forth in the Notice of Proposed Rulemaking, served on October 3, 2000 (the “NPRM”) in this proceeding.

Maryland filed comments earlier in this proceeding in response to the Advance Notice of Proposed Rulemaking, and acknowledges the efforts this Board has made to address the issues it raised in those earlier comments. The State has no further comments at this time, except for those articulated in the Comments being filed today by the Mass Transit Administration on behalf of the MARC train service (jointly with the Southern

California Regional Rail Authority), but reserves the right to reply to issues raised by other parties in this proceeding in their comments on the proposed rules.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charles A. Spitulnik", written over a horizontal line.

Charles A. Spitulnik
McLeod, Watkinson & Miller
One Massachusetts Avenue, N.W.
Suite 800
Washington, D.C. 20001
(202) 842-2345
Counsel for the State of Maryland
Department of Transportation

Dated: November 17, 2000

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of November, 2000, a copy of the Comments of the State of Maryland Department of Transportation was served by first class mail, postage pre-paid upon all Parties of Record.

Charles A. Spitulnik
Charles A. Spitulnik